Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Part 90 of	)	
the Commission's Rules to	)	PR Docket No. 93-144
Facilitate Future Development	)	
of SMR Systems in the 800 MHz	)	
Frequency Band	)	

To: The Commission

REPLY COMMENTS
OF
QUESTAR TELECOM, INC.

Questar Telecom, Inc., by its counsel and pursuant to Section 1.415 of the Commission's Rules and Regulations, 47 C.F.R. § 1.415, hereby submits its Reply to the Comments received by the Commission on its Notice of Proposed Rule Making ("Notice") in the above-styled proceeding.[1]

Questar Telecom, Inc. ("QTI") is a wholly-owned subsidiary of Questar Corporation, an integrated natural gas holding company headquartered in Salt Lake City, Utah.[2] QTI was organized in 1989 to utilize its parent company's expertise in radio communications, and has since become a major provider of Specialized Mobile Radio ("SMR") services in Seattle, Washington; Portland, Oregon; Las

[1] Notice of Proposed Rule Making (FCC 93-257), PR Docket No. 93-144 (June 9, 1993).

[2] Questar Corporation has $1.2 billion in assets which are distributed nearly equally among three primary businesses: oil and gas exploration, production, and marketing; interstate gas transmission and storage; and retail gas distribution. Questar Corporation's principal non-gas-related activity is telecommunications; primarily, specialized mobile radio ("SMR") operations.

Vegas, Nevada; Phoenix, Arizona; Salt Lake City, Utah; and Santa Maria, California, as well as the markets surrounding these metropolitan areas. In addition to its SMR operations, QTI provides a variety of services, including radio equipment sales, radio equipment service and maintenance, communication site rentals, and community repeaters.

QTI currently has authorizations to implement an advanced-technology, wide-area SMR system in the Seattle/Portland area. Additionally, two other requests are pending before the Commission to implement advanced-technology, wide-area SMR systems in the Las Vegas, Nevada and Phoenix, Arizona metropolitan areas. Thus, QTI is well acquainted with the technological and marketplace forces that have led to this proceeding. QTI joins the consensus of the commenters[3] in supporting adoption of the proposals in the Notice with the modifications suggested herein.

A. Provision for Authorization of Non-SMR Pool Channels in the U.S/Canadian and U.S./Mexican Border Areas

The Notice did not address the issue of the procedure by which channels allocated to the SMR pool in the U.S./Canadian border areas and the U.S./Mexican border areas would be authorized under the EMSP license. QTI has a particular concern in regard to the Seattle area, a portion of which lies in Region 5 of the Canadian/U.S. border areas. In this Region, certain channels are allocated as SMR pool channels that in other areas of the country

[3] The majority of persons commenting in this proceeding generally supported the EMSP concept. Only one party, Radiofone Corporation opposed the amendment of Part 90 to establish the EMSP license.

are designated as General Category pool channels. Unlike the other non-border areas, the Commission has allocated only 95 channels for SMR use in these border regions. A wait list in the Seattle area for 800 MHz SMR channels has existed for several years. Further, there are no General Category channels for intercategory sharing licensing by SMR operators to expand their systems in these regions. Thus, a number of these SMR systems have expanded utilizing Business and Industrial/Land Transportation service pool channels.

Accordingly, should the Commission determine that it would not permit the use of General Category pool channels in the non-border area, QTI would be prevented from using a portion of its authorized channels throughout the Seattle metropolitan area. Additionally, if SMR pool channels were permitted to be used in border areas such as Seattle, effective EMSP operations may be precluded due to the limited number of SMR channels available for operation in these region areas. QTI encourages the Commission to ensure that SMR licensees in the Canadian border areas are not disadvantaged and are able to implement effective EMSP systems similar to the systems that would be permitted to be implemented in non-border areas.

Similarly, the same issue exists with SMR systems in the U.S./Mexican border areas. Again, the Commission has allocated 95 800 MHz channels for SMR licensing. With the limited number of SMR channels, SMR operators in these areas have relied heavily upon the availability of the Business and Industrial/Land Transportation channels through the intercategory sharing rules. Thus, unless SMR

operators in this border area can include non-SMR channels in an EMSP authorization, the effectiveness of EMSP licensing in this area may be precluded. Therefore, in both the border areas, QTI believes that it is critical, should the Commission not generally permit the inclusion of non-SMR pool channels in EMSP authorizations, that the Commission permit SMR licensees in border areas to utilized non-SMR pool channels for EMSP licensing purposes.

B. Offset Channel Usage in the U.S./Mexican Area

Additionally, in the U.S./Mexican border area, the channels allocated for SMR operations are 12.5 offset from the regularly-assignable U.S. channels. QTI believes that a clarification of the interference protection afforded between the offset channels and the regularly-assignable channels which they overlap is required in this proceeding to avoid harmful and chaotic interference between EMSP (or SMR) operations on offset channels and EMSP (or SMR) operations on regularly assignable channels.

In the proceeding in which the Commission allocated the total of 200 offset channels for Private Land Mobile Radio Services ("PLMRS") use, the Commission did not define the term "co-channel," but recognized the potential for interference between offset and non-offset stations. The Commission did not otherwise address in that decision the applicability of Section 90.621 of the Commission's rules to overlapping offset and non-offset channels.

In Joint Comments in the on-going docket examining the co-channel protection criteria for PLMRS stations above 800 MHz (PR

Docket 93-60), the National Association of Business and Educational, Inc. ("NABER"), the American Mobile Telecommunications Association, Inc. ("AMTA"), Motorola, Inc., and the Industrial Telecommunications Association, Inc. ("ITA") have requested that the Commission clarify the interference protection afforded between 800 MHz stations licensed in the Mexican border area on offset channels pursuant to Section 90.619 of the Commission's rules and stations outside the border area licensed on the regularly-assignable channels pursuant to Section 90.621. Joint Comments of NABER, AMTA, Motorola, and ITA, PR Docket No. 93-60 (June 19, 1993) at 15-17. In this respect, the Joint Commenters note that "[p]reviously, the Commission's Gettysburg Licensing Division utilized an informal policy of reviewing applications for spacing less than 50 miles from a system offset by 12.5 kHz. However, such review is no longer performed." Id. at 15. The Joint Commenters thus requested that the Commission afford full co-channel interference protection between the offset channels and all regularly assignable channels from which they are offset. In the alternative, the Joint Commenters requested that the Commission establish a Table employing a 10 dB protection value between the offset channels and the regularly assignable channels.

QTI concurs with the Joint Commenters in PR Docket 93-144 that interference protection between the offset channels and the regularly-assignable channels, whether operated by SMR or EMSP licensees, is necessary to ensure reliable operations both by offset channels licensed within the border area and non-offset

channels licensed outside the border area. Clearly, interference protection is necessary between stations that operate on overlapping channels.

The provision of a reasonable measure of interference protection between stations operating an overlapping channels is of even greater importance in this proceeding. EMSP licensees will be expected to invest substantial capital in constructing and operating advanced systems both within the U.S./Mexican border area and in areas contiguous thereto. To attract the capital necessary to implement these advance systems, and to attract and retain customers for those systems to provide a revenue base, the EMSP licensees must possess assurance that destructive interference between their system and another closely-spaced EMSP or SMR system will not occur. Accordingly, QTI urges the Commission to clarify that overlapping channels are afforded interference protection as detailed by NABER, AMTA, Motorola, and ITA in PR Docket 93-144.

WHEREFORE, THE PREMISES CONSIDERED, Questar Telecom, Inc. requests that the Commission take action in a manner consistent with the comments herein.

Respectfully submitted,

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